

HANDAL & MOROFSKY LLC
COUNSELLORS AT LAW

PLEASE REPLY TO:

CONNECTICUT OFFICE

Via ECF
Hon. Kevin Nathaniel Fox
Thurgood Marshall, United States Courthouse
40 Foley Square
New York, NY 10007

March 5, 2021

Re: *Stay You v. H&M Hennes & Mauritz*, Civil Case No. 1:20-cv-01396-KMW-KNF

Dear Judge Fox:

We represent Plaintiff Stay You in this action for infringement of the mark STAY YOU. We write to the court in view of the upcoming March 10 deadline for the submission of a pretrial order (Dkt. No. 30). We seek an order extending the date to file the pretrial order or to submit a pre-motion letter to request leave to file a dispositive motion by one month to April 12, 2021.

The discovery cut-off deadline was on February 1, 2021. (Dkt. No. 20.) However, the parties are continuing to confer in good faith regarding outstanding discovery issues, including obtaining documents and related information that is necessary for the parties to prepare the pretrial submissions or to file a dispositive motion. In light of the parties' continued efforts to resolve outstanding discovery and engage in settlement negotiations, Plaintiff respectfully requests an extension of the date to file the pretrial order or to submit a pre-motion letter to request leave to file a dispositive motion to April 12, 2021.

Counsel for Defendant has agreed to join in this request.

Respectfully submitted,



Anthony H. Handal
Counsel to Plaintiff, Stay You, LLC